

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

IN RE: *EX PARTE* APPLICATION FOR *EX PARTE*
ORDER TO DISCLOSE RETURNS, RETURN
INFORMATION, AND TAXPAYER RETURN
INFORMATION

No. 1:20-mc-87

MOTION TO EXTEND SEAL AT LEVEL II:
EX PARTE APPLICATION FOR ORDER FOR
DISCLOSURE OF INCOME TAX RETURNS; THE RESULTING
ORDER; THIS MOTION; & CORRESPONDING DOCKET TEXT ENTRIES

The United States of America respectfully moves to extend the seal at Level II the Ex Parte Application for an Order for Disclosure of Income Tax Returns and Return Information, including any Order that may issue, this Motion, and the corresponding docket text entries for 180 days, expiring on April 11, 2022, on the following grounds:

Under Federal Rule of Criminal Procedure 49.1(d) and Local Rule 83.12(a)(1), the Court has authority to grant this motion.

The Ex Parte Application and any Order that may issue contain sensitive information, which, if prematurely released, may compromise an ongoing criminal investigation. Specifically, the Ex Parte Application reveals the identities of the targets of the investigation and some of the evidence investigators have uncovered supporting reason to believe that the targets are involved in criminal activity. Investigators believe that the targets are unaware that they are considered to be suspects or are unaware of the incriminating evidence investigators have gathered against them. Should information identifying the targets and the

Motion To Seal Ex Parte Application to Disclose Tax Records and Associated Documents
Page 2 of 2

evidence against them be released, it may cause the targets to flee, destroy evidence, or change their patterns of behavior.

Respectfully submitted,

JOHN J. FARLEY
Acting United States Attorney

Dated: October 13, 2021

By: /s/ John J. Kennedy
John J. Kennedy
Assistant United States Attorney

Motion ☐ Granted ☐ Denied

Andrea K. Johnstone
United States Magistrate Judge
Date: